



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor  
Toni Hardesty, Director

March 8, 2005

**Certified Mail No. 7000 0520 0016 0850 4448**

Robert Schutte, Operations Manager  
ConAgra Foods Packaged Food Company, Inc.  
P.O. Box 489  
American Falls, Idaho 83211

RE: Facility ID No. 077-00017, ConAgra Foods Packaged Foods Company, Inc., American Falls Final Tier II Operating Permit Letter

Dear Mr. Schutte:

The Department of Environmental Quality (DEQ) is issuing Tier II/PTC Permit No. T2-040324 for the ConAgra Foods Packaged Food Company located in American Falls, in accordance with the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200-228 and IDAPA 58.01.01.400-470, respectively.

The enclosed Tier II/PTC permit is based on the information contained in your permit application and the Tier II/PTC Permit Number 077-00017, issued July 31, 2002. This permit is effective immediately and supersedes the Tier II/PTC issued on July 31, 2002.

A representative of the Pocatello Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Dan Pitman at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator  
Air Quality Division

MB/DM/sd Permit No. T2-040324

Enclosure



**Air Quality  
TIER II OPERATING PERMIT  
and  
PERMIT TO CONSTRUCT**

**State of Idaho  
Department of Environmental Quality**

**PERMIT NO.:** T2-040324  
**FACILITY ID NO.:** 077-00017  
**AQCR:** 061 **CLASS:** SM80  
**SIC:** 2037 **ZONE:** 12  
**UTM COORDINATE (km):** 343.4,4736.2

**1. PERMITTEE**

ConAgra Foods Packaged Foods Company, Inc., dba Lamb Weston, Inc. and ConAgra Foods Specialty Potato Products

**2. PROJECT**

Tier II Operating Permit and Permit to Construct

**3. MAILING ADDRESS**

P. O. Box 489

**CITY**

American Falls

**STATE**

ID

**ZIP**

83211

**4. FACILITY CONTACT**

Robert Bloom

**TITLE**

Services Manager

**TELEPHONE**

(208) 226-2301

**5. RESPONSIBLE OFFICIAL**

Robert Schutte

**TITLE**

Operations Manager

**TELEPHONE**

(208) 226-2301

**6. EXACT PLANT LOCATION**

42° 46 min 10 sec N, 112° 54 min 30 sec W

**COUNTY**

Power

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Production of Frozen and Dehydrated Potato Products

**8. PERMIT AUTHORITY**

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200 et seq. and IDAPA 58.01.01.400, et seq. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not yet begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (DEQ) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 of the *Rules*.

  
TONI HARDESTY, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

**DATE ISSUED:** March 8, 2005

**DATE EXPIRED:** July 31, 2007

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## **Acronyms, Units, and Chemical Nomenclatures**

ACFM	Actual Cubic Feet Per Minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
BACT	Best Available Control Technology
CFR	Code of Federal Regulations
CO	Carbon Monoxide
DEQ	Idaho Department of Environmental Quality
dscf	Dry Standard Cubic Feet
EF	Emission Factor
EPA	United States Environmental Protection Agency
gpm	Gallons Per Minute
gr	Grain (1 lb = 7,000 grains)
HAPs	Hazardous Air Pollutants
IDAPA	Idaho Administrative Procedures Act
km	Kilometer
lb/hr	Pound Per Hour
MACT	Maximum Available Control Technology
MMBtu	Million British thermal units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO <sub>2</sub>	Nitrogen Dioxide
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
O <sub>3</sub>	Ozone
OP	Operating Permit
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter with an Aerodynamic Diameter of 10 Micrometers or Less
ppm	Parts Per Million
PSD	Prevention of Significant Deterioration
PTC	Permit To Construct
PTE	Potential To Emit
SCC	Source Classification Code
scf	Standard Cubic Feet
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
TSP	Total Suspended Particulates
T/yr	Tons Per Year
µm	Micrometers
VOC	Volatile Organic Compound

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NUMBER : T2-040324**

<b>Permittee:</b>	ConAgra Foods Packaged Foods Company, Inc., dba Lamb Weston, Inc. and ConAgra Foods Specialty Potato Products	<b>Facility ID No.</b> 077-00017	<b>Date Issued:</b>	March 8, 2005
<b>Location:</b>	American Falls, Idaho		<b>Date Expires:</b>	July 31, 2007

**1. PERMIT SCOPE****Purpose**

- 1.1 This Tier II operating permit is a revision to the facilities existing permit. This revision is a facility name change.
- 1.2 This Tier II operating permit and permit to construct replaces the following permits, the terms and conditions of which shall no longer apply:
- PTC No. 077-00017 issued October 8, 2000, for the line 2 dryer replacement. *P-000322*
  - PTC No. 083-00062 issued August 8, 2000, for the line 2 dryer replacement. *P-000305A*
  - PTC No. 083-00062 issued June 30, 2000, for the Co-Products line split. *P-000305*
  - Tier II Permit No. 077-00017 issued June 2, 2000. *T2-000003 ✓*
  - Tier II Permit No. 077-00017 issued February 23, 1996. *9501-006-2 ✓*
  - Tier II Permit No. 077-00017 issued December 27, 1995.
  - Tier II/PTC No. 077-00017 issued July 31, 2002 *T2-010320 ✓*

**Regulated Sources**

- 1.3 Table 1.1 below lists all regulated emissions sources in this permit.

**Table 1.1 REGULATED EMISSIONS SOURCES**

Permit Sections	Source Description	Emissions Control(s)
3	Frozen Fried Product Line 1	Reyco Scrubber (2500)
4	Frozen Fried Product Line 2	Ducon Scrubber (UW-3)
5	Dehydrated (flake) Product Line	Ken Bratney Co. Kice 21-8 Dust Collector
		Pneumafil Corporation Fabric Filter (6.5-92-6)
		Mikro-Pulsaire Filter
6	Boilers No.1, No. 2, No. 3, No. 4	
7	Specialized Product Lines No. 3, and No. 5	Reyco Scrubbers

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NUMBER : T2-040324**

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**2. FACILITY-WIDE CONDITIONS*****Facility Emissions***

- 2.1 All reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 58.01.01.650-651.
- 2.2 Unless specified elsewhere in this permit, the permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 Unless specified elsewhere in this permit, the permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after a valid complaint is received. The records shall, at a minimum, include the date each complaint was received and a description of the following: the complaint; the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

***Odors***

- 2.4 No person shall allow, suffer, cause, or permit the emissions of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- 2.5 Unless specified elsewhere in this permit, the permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

***Visible Emissions***

- 2.6 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.
- 2.7 The permittee shall conduct a monthly, facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. If any visible emissions are present from any point of emissions, the permittee shall take appropriate corrective action as expeditiously as practicable. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action, and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall keep records of the results of each monthly visible emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken. A compilation of the most recent five years of data shall be kept onsite and shall be made available to DEQ representatives upon request.

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NUMBER : T2-040324**

<b>Permittee:</b>	ConAgra Foods Packaged Foods Company, Inc., dba Lamb Weston, Inc. and ConAgra Foods Specialty Potato Products	<b>Facility ID No.</b> 077-00017	<b>Date Issued:</b>	February 9, 2005
<b>Location:</b>	American Falls, Idaho		<b>Date Expires:</b>	July 31, 2007

***Excess Emissions***

- 2.8 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets, and breakdowns.

***Fuel Burning Operating Requirements***

- 2.9 The combined combustion of all fuels from all sources shall not cause oxides of nitrogen (NO<sub>x</sub>) or carbon monoxide (CO) to be emitted to the atmosphere in quantities greater than 99 tons per year (T/yr) for each pollutant for any consecutive 12-month period.

***Fuel Consumption Monitoring and Recording***

- 2.10 The permittee shall monitor and record the following parameters to verify compliance with the permit. The records shall be kept at the facility for the most recent five-year period and shall be made available to DEQ representatives upon request.
- Calendar date and total amount of natural gas burned at the entire facility per month and per any consecutive 12-month period.
  - Calendar date and total amount of natural gas burned in Boiler No. 1, Boiler No. 2, and Boiler No. 3 per month and per any consecutive 12-month period.
  - Calendar date and amount of vegetable oil burned in Boiler No. 1, Boiler No. 2, and Boiler No. 3 per month and per any consecutive 12-month period.
  - Calendar date and amount of diesel burned in Boiler No. 1, Boiler No. 2, and Boiler No. 3 per month and per any consecutive 12-month period.
  - Fuel analyses for sulfur content of all 0.05% diesel burned at the facility shall be obtained for each lot of diesel received.
- 2.11 The permittee shall calculate monthly the NO<sub>x</sub> and CO emissions for the previous 12-month period to ensure NO<sub>x</sub> and CO emissions do not exceed 99 T/yr. The records shall be submitted to DEQ every 12 months, kept at the facility for the most recent five-year period, and be made available to DEQ representatives upon request.

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NUMBER : T2-040324**

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<b>Location:</b>	American Falls, Idaho		<b>Date Expires:</b>	<b>July 31, 2007</b>

2.12 NO<sub>x</sub> calculations shall be made using the following table:

**Table 2.1 NO<sub>x</sub> EMISSIONS CALCULATIONS**

Sources	Fuel Usage (previous 12 months)	Emission Factor	Emissions
Boiler No. 1 Natural Gas	MMCF <sup>a</sup> x	45 lb/MMCF =	lbs
Rest Of The Plant Natural Gas	MMCF x	100 lb/MMCF =	lbs
Boiler No. 1 Diesel	Gallons x	10 lb/1000 gal =	lbs
Boiler No. 2 & Boiler No. 3 Diesel	Gallons x	20 lb/1000 gal =	lbs
Boiler No. 1 Vegetable Oil	Gallons x	12.5 lb/1000 gal =	lbs
Boiler No. 2 & No. 3 Vegetable Oil	Gallons x	25 lb/1000 gal =	lbs
Total =			lbs Tons

<sup>a</sup> Million cubic feet

2.13 CO calculations shall be made using the following table:

**Table 2.2 CO EMISSIONS CALCULATIONS**

Sources	Fuel Usage (previous 12 months)	Emission Factor	Emissions
Boiler No. 1 Natural Gas	MMCF <sup>a</sup> x	84 lb/MMCF =	lbs
Rest of the Plant Natural Gas	MMCF x	84 lb/MMCF =	lbs
Boiler No. 1 Diesel	Gallons x	5 lb/1000 gal =	lbs
Boiler No. 2 & Boiler No. 3 Diesel	Gallons x	5 lb/1000 gal =	lbs
Boiler No. 1 Vegetable Oil	Gallons x	5 lb/1000 gal =	lbs
Boiler No. 2 & No. 3 Vegetable Oil	Gallons x	5 lb/1000 gal =	lbs
Total =			lbs Tons

<sup>a</sup> Million cubic feet

**General Operating Requirements**

2.14 The permittee shall monitor and record, both daily and annually, the finished potato product output of the Dehydrated Line, Line No. 1, Line No. 2, Specialized Product Line No. 3, and Specialized Product Line No. 5 to demonstrate compliance with the following throughput limits. Output shall be recorded as T/day and tons per any consecutive 12-month period. The respective output for each day may be determined using monthly output records. Records of the most recent five-year period shall be maintained onsite and shall be made available to DEQ representatives upon request.

- The Dehydrated line shall have a total maximum output of 50 T/day, or 16,650 tons per any consecutive 12-month period.
- Line No. 1 shall have a total maximum output of 945 T/day, or 301,905 tons per any consecutive 12-month period.
- Line No. 2 shall have a total maximum output of 510 T/day, or 167,790 tons per any consecutive 12-month period.
- Specialized Product Line No. 3 shall have a total maximum output of 265 T/day, or 87,400 tons per any consecutive 12-month period.
- Specialized Product Line No. 5 shall have a total maximum output of 130 T/day, or 42,800 tons per any consecutive 12-month period.



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<b>Location:</b>	American Falls, Idaho		<b>Date Expires:</b>	July 31, 2007

**Open Burning**

- 2.15 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

**Test Methods**

- 2.16 If testing is required, the permittee shall use the following test methods described in Table 2.3 to measure the pollutant emissions:

**Table 2.3 TEST METHODS**

Pollutants	Test Methods	Special Conditions
PM <sub>10</sub>	EPA Method 201.a. <sup>1</sup> , 202	
PM	EPA Method 5 <sup>1</sup>	
NO <sub>x</sub>	EPA Method 7 <sup>1</sup>	
SO <sub>2</sub>	EPA Method 6 <sup>1</sup>	
CO	EPA Method 10 <sup>1</sup>	
VOC	EPA Method 25 <sup>1</sup>	
Opacity	EPA Method 9 <sup>1</sup>	If an NSPS source, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only.

<sup>1</sup> Or DEQ-approved alternative in accordance with IDAPA 58.01.01.157

**Performance Test Report**

- 2.17 In accordance with IDAPA 58.01.01.157.04, the permittee shall submit a written report of the performance test results to DEQ within 30 days of test completion.

**Reports and Certifications**

- 2.18 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to:

Air Quality Permit Compliance  
Department of Environmental Quality  
Pocatello Regional Office  
444 Hospital Way #300  
Pocatello, ID 83201  
(208) 236-6160

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**3. FROZEN FRIED PRODUCT LINE 1****3.1 Process Description**

A predetermined blend of clean, raw potatoes are drawn from the holding bays and are sized and peeled. The peeled potatoes are then trimmed, preheated, cut, wet-graded, sorted, and then fed to the defect-removal equipment, where defective material is removed and routed to the hopper waste. Undersized cuttings are routed to the dehydrated flake product line.

The sorted product is blanched in hot water then fed to a steam-heated dryer, from which it leaves in a "nearly dry" state. From the dryer, the potato product goes to the fryer, then to a freeze tunnel and frozen graders. Finally, the product goes to packaging, after which it is placed on pallets and then put in cold storage.

Emissions from the Line 1 fryer exit the process through a Reyco scrubber. The scrubber uses a water droplet bath to remove oil droplets in the fryer exhaust for subsequent collection in the water sump.

The blancher and the peeler vent only process steam.

**3.2 Control Description****Line 1 Steam-heated Dryers**

Emissions from the steam-heated dryers are uncontrolled.

**Line 1 Deluge Fryer**

Emissions from the Line 1 fryer are controlled by a scrubber with the following specifications:

Manufacturer:	Reyco
Model Number:	2500
Max. Inlet Flow Rate:	17,500 acfm
Max. Outlet Flow Rate:	16,000 acfm
Pressure Drop:	0.5 to 3.5 inch water

***Emissions Limits***

- 3.3 Emissions from the Frozen Fried Product Line 1 Reyco scrubber shall not exceed any limits listed in the appendices of this permit.

***Operating Requirements*****3.4 Monitoring Equipment**

The permittee shall calibrate, maintain, and operate in accordance with manufacturer specifications, the equipment that continuously measures the pressure differential across the air pollution control equipment and the scrubbing media flow rate to the air pollution control equipment.

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NUMBER : T2-040324**

<b>Permittee:</b>	ConAgra Foods Packaged Foods Company, Inc., dba Lamb Weston, Inc. and ConAgra Foods Specialty Potato Products	<b>Facility ID No.</b> 077-00017	<b>Date Issued:</b>	February 9, 2005
<b>Location:</b>	American Falls, Idaho		<b>Date Expires:</b>	July 31, 2007

**3.5 Operations and Maintenance Manual Requirements**

The operations and maintenance (O&M) manual for the air pollution control devices, which describes the procedures that will be followed to comply with General Provision 2 and the air pollution control device requirements contained in this permit, shall remain onsite at all times and shall be made available to DEQ representatives upon request.

**3.6 Pressure Drop Across Air Pollution Control Devices**

The pressure drop across the air pollution control devices shall be maintained within manufacturer and O&M manual specifications. Documentation of both the manufacturer and O&M manual operating pressure drop specifications shall remain onsite at all times and shall be made available to DEQ representatives upon request.

**3.7 Scrubbing Media Flow Rate**

The scrubbing media pump pressure to the air pollution control devices shall be maintained within manufacturer's and O&M manual specifications. Documentation of the manufacturer and O&M manual operating scrubbing media specifications shall remain onsite at all times and shall be made available to DEQ representatives upon request.

3.8 Line 1 shall not be operated without the associated Reyco scrubbers.

**Monitoring and Recordkeeping Requirements****3.9 Air Pollution Control Equipment**

The following parameters shall be monitored and recorded during operation as specified below. A compilation of the most recent five years of data shall be kept onsite, and shall be made available to DEQ representatives upon request.

- Pressure drop across the air pollution control device, once daily.
- The scrubbing pump pressure to the air pollution device, once daily.
- Maintenance on the air pollution control device and any modifications made to the operating specifications, as performed.

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NUMBER : T2-040324**

<b>Permittee:</b>	ConAgra Foods Packaged Foods Company, Inc., dba Lamb Weston, Inc. and ConAgra Foods Specialty Potato Products	<b>Facility ID No.</b> 077-00017	<b>Date Issued:</b>	March 8, 2005
<b>Location:</b>	American Falls, Idaho		<b>Date Expires:</b>	July 31, 2007

**4. FROZEN FRIED PRODUCT LINE 2****4.1 Process Description**

Raw potatoes are cleaned, sized, and peeled by a steam peeler. The peeled potatoes are then trimmed, cut, wet-graded, sorted, and passed through defect removal equipment, then blanched (partially cooked) by immersion in hot water. A natural gas-fired dryer then dries potato products. From the dryer, the products are transferred to the Line 2 fryer. Immediately after frying, the product is frozen, graded, packaged, and stored in a warehouse.

Emissions from the Line 2 fryer exit the process through a Ducon scrubber. The scrubber uses a water droplet bath to remove oil droplets in the fryer exhaust for subsequent collection in the water sump.

The peeler and blancher vent only process steam.

**4.2 Control Description****Line 2 Natural Gas-fired Dryers**

Emissions from the Line 2 natural gas-fired dryer are uncontrolled.

**Line 2 Deluge Fryer**

A scrubber with the following specifications controls emissions from the Frozen Fried Product Line 2:

Manufacturer:	Ducon
Model Number:	UW-3, Size 90
Max. Inlet Flow Rate:	26,000 acfm
Max. Outlet Flow Rate:	23,794 acfm
Pressure Drop:	0.0 to 1.0 inch water
Wet Scrubber Flow:	20 to 60 gpm

***Emissions Limits***

- 4.3 Emissions from the Line 2 Ducon scrubber shall not exceed any limits listed in the appendices of this permit.

***Operating Requirements*****4.4 Fuel Specification**

The Frozen Fried Product Line 2, dryer (natural gas-fired) and fryer, shall burn natural gas exclusively.

**4.5 Monitoring Equipment**

The permittee shall calibrate, maintain, and operate in accordance with manufacturer specifications, the equipment that continuously measures the pressure differential across the air pollution control equipment and the scrubbing media flow rate to the air pollution control equipment.

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NUMBER : T2-040324**

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<b>Location:</b>	American Falls, Idaho		<b>Date Expires:</b>	July 31, 2007

**4.6 Operations and Maintenance Manual Requirements**

The O&M manual for the air pollution control devices, which describes the procedures that will be followed to comply with General Provision 2 and the air pollution control device requirements contained in this permit, shall remain onsite at all times and shall be made available to DEQ representatives upon request.

**4.7 Pressure Drop Across Air Pollution Control Devices**

The pressure drop across the air pollution control devices shall be maintained within manufacturer and O&M manual specifications. Documentation of both the manufacturer's and O&M manual operating pressure drop specifications shall remain onsite at all times and shall be made available to DEQ representatives upon request.

**4.8 Scrubbing Media Flow Rate**

The scrubbing media flow rate to the air pollution control devices shall be maintained within manufacturer's and O&M manual specifications. Documentation of the manufacturer and O&M manual operating scrubbing media specifications shall remain onsite at all times and shall be made available to DEQ representatives upon request.

4.9 Line 2 shall not be operated without the associated Ducon scrubbers.

***Monitoring and Recordkeeping Requirements*****4.10 Air Pollution Control Equipment**

The following parameters shall be monitored and recorded during operation as specified below. A compilation of the most recent five years of data shall be kept onsite, and shall be made available to DEQ representatives upon request.

- Pressure drop across the air pollution control device, once daily.
- The scrubbing media flowrate to the air pollution device, once daily.
- Maintenance on the air pollution control device and any modifications made to the operating specifications, as performed.

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NUMBER : T2-040324**

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**5. DEHYDRATED (FLAKE) PRODUCT LINE: DRUM DRYERS 1 AND 2, KICE FILTER, PNEUMAFIL FILTER, AND MIKRO-PULSAIRE FILTER****5.1 Process Description**

Raw potato screen-out and hydro-sieve and the undersized cuttings from line 1 are routed to the flake holding tank. From the holding tanks, raw potatoes are transferred to the flake blancher, flake chiller, then cooked in the flake cooker where steam is injected and additives are introduced.

The cooked product is ground to a mash and fed to one of two drum dryers, where it is rolled into a fine sheet of dehydrated potato. The sheet is broken into smaller portions, transported through one of two cyclones, and then is either put into a tote for later use or run to a hammer mill. The hammer mill grinds the dehydrated product to the desired coarseness for either potato flakes or flour. From the hammer mill, the product passes to the Kice collection system where different densities are separated for packaging.

**5.2 Control Description****Drum Dryer No. 1 and Drum Dryer No. 2**

Emissions from both of the drum dryers are uncontrolled.

**Kice Collection/Sizing System**

Emissions from the Kice collection system (flake sizing) are controlled by the Kice fabric filter with the following specifications:

Manufacturer:	Ken Bratney Co.
Model:	Kice 21-8 Dust Collector
Air/Cloth Ratio:	7.9 to 1

**Packaging System**

Fugitive emissions from the packaging system and the flake process area are collected and controlled by a fabric filter with the following specifications:

Manufacturer:	Pneumafil Corporation
Model:	6.5-92-6
Air/Cloth Ratio:	8.0 to 1

**Micro-Pulsair**

Fugitive emissions from the hammer mill area of the flake process area are collected and controlled by a fabric filter with the following specifications:

Manufacturer:	Pulverizing Machinery
Model:	Mikro-Pulsaire Dust Collector
Air/Cloth Ratio:	8.0 to 1

***Emissions Limits***

- 5.3 Emissions from the Kice, Pneumafil, and Mikro-Pulsaire fabric filters shall not exceed any limits listed in the appendices of this permit.

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***Operating Requirements***

- 5.4 The Kice, Pneumafil, and Mikro-Pulsaire filters shall at all times be maintained in good working order and shall be operated as efficiently as practical.
- 5.5 The permittee shall develop an O&M manual for the Kice, Pneumafil, and Mikro-Pulsaire filters, which will be followed to demonstrate that the filters are operated as efficiently as practical. The manuals shall include operating pressure drop requirements.

**5.6 Monitoring Equipment**

The permittee shall calibrate, maintain, and operate in accordance with manufacturer specifications, the equipment that continuously measures the pressure differential across the air pollution control equipment.

**5.7 Operations and Maintenance Manual Requirements**

The O&M manual for the air pollution control devices, which describes the procedures that will be followed to comply with General Provision 2 and the air pollution control device requirements contained in this permit, shall remain onsite at all times and shall be made available to DEQ representatives upon request.

**5.8 Pressure Drop Across Air Pollution Control Devices**

The pressure drop across the air pollution control devices shall be maintained within manufacturer and O&M manual specifications. Documentation of both the manufacturer and O&M manual operating pressure drop specifications shall remain onsite at all times and shall be made available to DEQ representatives upon request.

***Monitoring and Recordkeeping Requirements*****5.9 Air Pollution Control Equipment**

The following parameters shall be monitored and recorded during operation as specified below. A compilation of the most recent five years of data shall be kept onsite, and shall be made available to DEQ representatives upon request.

- Pressure drop across the air pollution control devices, once daily.
- Maintenance on the air pollution control device and any modifications made to the operating specifications, as performed.

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**6. BOILER NO. 1, BOILER NO. 2, BOILER NO. 3, BOILER NO. 4, AMUS, AND SPACE HEATERS****6.1 Process Description**

There are three boilers for the supply of the facility's process steam and one boiler for heat supply to the facility's fire system water source to prevent freezing during winter.

There are various sizes of air makeup units (AMUs) and other space heating equipment.

**6.2 Control Description**

Emissions from Boilers No. 1, No. 2, No. 3, and No. 4 are uncontrolled.

Emissions from the AMUs and space heating equipment are uncontrolled.

***Emissions Limits*****6.3 Boiler No. 1, Boiler No. 2, Boiler No. 3, and Boiler No. 4**

Emissions from the boilers exhaust stacks shall not exceed emissions limits listed in the appendices of this permit.

***Fuel Burning Requirement***

PM and PM<sub>10</sub> emissions limits from Boiler No. 1, Boiler No. 2, Boiler No. 3, and Boiler No. 4 exhaust stacks shall not exceed 0.015 gr/dscf corrected to 3% oxygen by volume when burning natural gas, or 0.050 gr/dscf of effluent gas adjusted to 3% oxygen when diesel or vegetable oil is combusted as per IDAPA 58.01.01.675.

***Operating Requirements*****6.4 Boilers No. 1, No. 2, No. 3, and No. 4****Fuel Specification**

Boilers No. 1, No. 2, No. 3, shall burn natural gas, 0.05% diesel fuel with 0.05% sulfur or less, or vegetable oil. Boiler No. 4 shall burn natural gas exclusively.

**6.5 AMUs and Space Heating Equipment****Fuel Specification**

All AMUs and space heating equipment shall burn natural gas fuel exclusively.



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***Monitoring and Recordkeeping Requirements*****6.6 Operation Parameters Monitors**

The permittee shall record the parameters required in Permit Conditions 2.10 thru 2.13 to verify compliance with this permit. The records shall be kept at the facility for the most recent five-year period and shall be made available to DEQ representatives upon request.

***Performance Test*****6.7 PM<sub>10</sub> Performance Tests**

The permittee shall conduct a performance test to measure PM<sub>10</sub> from the Boiler No.1 stack while burning only vegetable oil within 180 days of installation of the capability to burn vegetable oil, and at a minimum of once every five years thereafter. The permittee shall use the results of the PM<sub>10</sub> performance tests to establish a PM<sub>10</sub> emissions factor that shall be used to estimate emissions from each boiler at the facility when burning vegetable oil and to determine compliance with the PM<sub>10</sub> emissions limits specified in this permit. This performance test, and any subsequent performance tests conducted to demonstrate compliance with this permit, shall be performed in accordance with IDAPA 58.01.01.157, General Provision 9 of this permit, and the following requirements:

- Visible emissions shall be observed during each performance test run using methods specified in IDAPA 58.01.01.157.
- The amount of vegetable oil burned during the test and the steam output of Boiler No.1 shall be recorded during each performance test.

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**7. SPECIALIZED PRODUCT LINE 3 AND LINE 5****7.1 Process Description**

Raw potatoes from the even-flow hoppers are routed to a steam peeler and barrel washer to remove the peelings. The potatoes are then inspected, scrubbed, polished, and cut. After cutting, the potatoes are blanched and then dried or retrograded.

Line 3 products pass through a steam-heated retrograde which may be operated to dry the product, and may pass through a natural gas-fired roaster depending on the product being produced.

Line 5 products pass through a natural gas heated retrograde which is operated to dry the product, and then pass through two natural gas-fired fryers that operate in parallel.

The specialized products are then sent to a freeze tunnel. After freezing, the specialized products are sorted, packaged, placed on pallets, and then sent to the cold storage area.

The peeler and the blancher vent only process steam.

**7.2 Control Description**

- Line 3 Retrograde  
Emissions from the Line 3 retrograde are uncontrolled.
- Line 3 Roaster  
Emissions from the Line 3 roaster are uncontrolled.
- Line 5 Retrograde  
Emissions from the Line 5 retrograde are uncontrolled.
- Line 5 Fryer 1  
Emissions from the Line 5 fryer 1 are controlled by a scrubber with the following specifications:  

Manufacturer:	Reyco
Model Number:	Type W Roto-Clone
Max. Outlet Flow Rate:	2,800 acfm
Pump Pressure:	60 to 90 psi
- Line 5 Fryer 2  
Emissions from the Line 5 fryer 2 are controlled by a scrubber with the following specifications:  

Manufacturer:	Reyco
Model Number:	Type W Roto-Clone
Max. Outlet Flow Rate:	2,800 acfm
Pump Pressure:	60 to 90 psi

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***Emissions Limits*****7.3 Reyco Exhaust Stacks**

Emissions from the Reyco stacks shall not exceed emissions limits listed in the appendices of this permit.

***Operating Requirements***

- 7.4 The Line 3 roaster, Line 5 retrograde and Line 5 fryers 1 and 2 shall burn natural gas exclusively.
- 7.5 The scrubbing media pump pressure to the Reyco wet scrubbers shall be maintained within the O&M Manual specifications.
- 7.6 Documentation of the O&M Manual scrubbing media pump pressure requirements shall be kept onsite and shall be made available to DEQ representatives upon request.
- 7.7 Line 5 fryers 1 and 2 shall not be operated without the associated Reyco scrubber.

***Monitoring and Recordkeeping Requirements*****7.8 Air Pollution Control Equipment**

The following parameters shall be monitored and recorded during operation as specified below. A compilation of the most recent five years of data shall be kept onsite, and shall be made available to DEQ representatives upon request.

- The scrubbing pump pressure to the air pollution device, once daily.
- Maintenance on the air pollution control device and any modifications made to the operating specifications, as performed.

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**8. APPENDIX – EMISSION RATE LIMITS AND EMISSIONS INVENTORY**

The following table contains the emission rate limits for the facility.

**Table 8.1 EMISSION RATE LIMITS.**  
Lamb Weston, Inc. – American Falls  
Hourly (lb/hr<sup>1</sup>) and Annual (T/yr<sup>2</sup>) Emissions Limits<sup>3</sup>

Source Description	PM <sub>10</sub> <sup>4</sup>		SO <sub>2</sub> <sup>5</sup>		CO		VOC <sup>6</sup>		NO <sub>x</sub> <sup>7</sup>	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	Lb/hr	T/yr	lb/hr	T/yr
Boiler No. 1	--	--	--	--	--	--	--	--	--	--
Boiler No. 2	--	--	--	--	--	--	--	--	--	--
Boiler No. 3	--	--	--	--	--	--	--	--	--	--
Boiler No. 4	--	--	--	--	--	--	--	--	--	--
Line 2 Dryer	1.50	5.97	--	--	--	--	--	--	--	--
Line 3 Roaster	0.06	0.24	--	--	--	--	--	--	--	--
Line 3 Retrograde	0.70	2.78	--	--	--	--	--	--	--	--
Line 5 Retrograde	0.39	1.52	--	--	--	--	--	--	--	--
Line 1 Dryer	2.50	9.89	--	--	--	--	--	--	--	--
Flake Dryer 1 & 2	0.13	0.53	--	--	--	--	--	--	--	--
Line 1 Reyco scrubber	3.94	15.55	--	--	--	--	--	--	--	--
Line 2 Ducon scrubber	2.13	8.39	--	--	--	--	--	--	--	--
Line 5 Fryer/scrubber 1	0.58	2.30	--	--	--	--	--	--	--	--
Line 5 Fryer/scrubber 2	0.58	2.30	--	--	--	--	--	--	--	--
Kice filter	0.07	0.29	--	--	--	--	--	--	--	--
Pneumafil filter	0.30	1.17	--	--	--	--	--	--	--	--
Mikro-Pulsaire filter	0.15	0.58	--	--	--	--	--	--	--	--
AMUs & space heaters	--	--	--	--	--	--	--	--	--	--
Facility Wide Emission Limit <sup>8,9</sup>	--	--	--	--	--	99.00	--	--	--	99.00

<sup>1</sup> Pounds per hour

<sup>2</sup> Tons per year

<sup>3</sup> As determined by a pollutant-specific U.S. EPA reference method, DEQ-approved alternative, or DEQ's emissions estimation methods used in the permit application analysis.

<sup>4</sup> Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns

<sup>5</sup> Sulfur dioxide

<sup>6</sup> Volatile organic compound

<sup>7</sup> Nitrogen oxides

<sup>8</sup> Carbon monoxide (CO) emissions from the total plant shall not exceed 99.00 T/yr, to maintain synthetic minor status. These sources can be run in any combination so as not to exceed 99.00 T/yr. Monitoring and record keeping will maintain this limit.

<sup>9</sup> Nitrogen oxides (NO<sub>x</sub>) emissions from the total plant shall not exceed 99.00 T/yr, to maintain synthetic minor status. These sources can be run in any combination so as not to exceed 99.00 T/yr. Monitoring and record keeping will maintain this limit.

The following table lists the potential emissions from all sources. This table is provided for information purposes only and is not intended to be permit limits.

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**Table 8.2 EMISSION INVENTORY BASED ON PTE.**

Lamb Weston, Inc. - American Falls Hourly (lb/hr) <sup>1</sup> and Annual (T/yr) <sup>2</sup> Potential Emissions Limits <sup>3</sup>										
Source Description	PM <sub>10</sub> <sup>4</sup>		SO <sub>2</sub> <sup>5</sup>		CO		VOC <sup>6</sup>		NO <sub>x</sub> <sup>7</sup>	
	Lb/hr	T/yr	Lb/hr	T/yr	Lb/hr	T/yr <sup>8</sup>	Lb/hr	T/yr	Lb/hr	T/yr <sup>9</sup>
Boiler No. 1	1.65	7.24	5.10	22.36	8.11	35.52	0.53	2.33	9.47	41.48
Boiler No. 2	0.79	3.47	2.45	10.71	3.89	17.04	0.25	1.11	9.07	39.73
Boiler No. 3	0.78	3.44	2.42	10.61	3.85	16.86	0.25	1.10	8.99	39.38
Boiler No. 4	0.02	0.08	0.002	0.006	0.21	0.92	0.01	0.06	0.25	1.10
Line 2 dryer	1.50	6.56	0.012	0.050	1.61	7.05	0.11	0.46	1.91	8.37
Line 3 Roaster	0.06	0.24	0.004	0.02	0.61	2.67	0.04	0.17	0.73	3.20
Line 3 Retrograde	0.70	3.09	--	--	--	--	--	--	--	--
Line 5 Retrograde	0.39	1.67	0.003	0.01	0.40	1.73	0.03	0.11	0.47	2.06
Line 1 Dryer	2.50	10.97	--	--	--	--	--	--	--	--
Flake Dryer 1 & 2	0.13	0.59	--	--	--	--	--	--	--	--
Line 1 Reyco scrubber	3.94	17.25	--	--	--	--	1.22	5.35	--	--
Line 2 Ducon scrubber	2.13	9.31	--	--	--	--	0.66	2.89	--	--
Line 5 Fryer/scrubber 1	0.58	2.53	0.003	0.01	0.40	1.75	0.11	0.48	0.47	2.06
Line 5 Fryer/scrubber 2	0.58	2.53	0.003	0.01	0.40	1.75	0.11	0.48	0.47	2.06
Kice filter	0.07	0.32	--	--	--	--	--	--	--	--
Pneumafil filter	0.30	1.29	--	--	--	--	--	--	--	--
Mikro-Pulsaire filter	0.15	0.65	--	--	--	--	--	--	--	--
AMUs & space heaters	0.55	2.6	0.047	0.21	6.56	28.73	0.43	1.88	7.81	34.21
Fugitive Dust	3.56	7.91	--	--	--	--	--	--	--	--
Facility Wide Potential <sup>8,9</sup>	--	81.74	--	43.99	--	99.00	--	16.43	--	99.00

<sup>1</sup> Pounds per hour

<sup>2</sup> Tons per year

<sup>3</sup> As determined by a pollutant-specific U.S. EPA reference method, DEQ-approved alternative, or DEQ's emissions estimation methods used in the permit application analysis.

<sup>4</sup> Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns

<sup>5</sup> Sulfur dioxide

<sup>6</sup> Volatile organic compound

<sup>7</sup> Nitrogen oxides

<sup>8</sup> Carbon monoxide (CO) emissions from the total plant shall not exceed 99.00 T/yr, to maintain synthetic minor status. These sources can be run in any combination so as not to exceed 99.00 T/yr. Monitoring and record keeping will maintain this limit.

<sup>9</sup> Nitrogen oxides (NO<sub>x</sub>) emissions from the total plant shall not exceed 99.00 T/yr, to maintain synthetic minor status. These sources can be run in any combination so as not to exceed 99.00 T/yr. Monitoring and record keeping will maintain this limit.

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**9. GENERAL PROVISIONS**

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
3. The permittee shall allow the director, and/or his authorized representative(s), the following upon the presentation of credentials:
  - To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
  - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the director.
4. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office.
5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the director.
7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the director's request shall cause the permit to be void.
8. The director may require the permittee to develop a list of operation and maintenance procedures to be approved by DEQ. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
9. Performance tests (i.e., air emissions source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 58.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the permittee obtains prior DEQ approval.

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The permittee shall submit a proposed test date for each performance test required by this permit to DEQ for approval at least 15 days prior to each respective test date (including each test date for periodic tests such as annual tests). The permittee shall promptly notify DEQ of any change in the proposed test date and shall provide at least five workdays advanced notice prior to conducting any rescheduled test, unless DEQ approves a shorter notice period.

Within 30 days of the date on which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation. The maximum allowable source operating rate shall be limited to 120% of the average operating rate attained during the most recent performance test conducted pursuant to this permit, for which a test protocol has been granted prior approval by DEQ, which demonstrated compliance with the respective pollutant emissions limit unless (1) a more restrictive operating limit is specified elsewhere in this permit or (2) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.

10. The provisions of this permit are severable, if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.